

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:	: Chapter 11
	: :
BIG LOTS, INC., <i>et al.</i> , <sup>1</sup>	: Case No. 24-11967 (JKS)
	: (Jointly Administered)
Debtors.	: Obj. Deadline: January 28, 2025 at 4:00 p.m. Hearing Date: February 26, 2025 at 10:30 a.m.
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**NOTICE OF MOTION OF BAYSHORE MALL 1A, BAYSHORE MALL 1B, LLC,  
AND BAYSHORE MALL 2, LLC TO COMPEL IMMEDIATE PAYMENT POST-  
PETITION RENT AND OBLIGATIONS PURSUANT TO  
11 U.S.C. §§ 365(d)(3) AND 503(b)(1)(A)**

**PLEASE TAKE NOTICE** that on January 9, 2025, Bayshore Mall 1A, LLC, Bayshore Mall 1B, LLC, and Bayshore Mall 2, LLC (together, “Bayshore”) (c/o Pintzuk Organization), through undersigned counsel, filed the *Motion of Bayshore Mall 1A, LLC, Bayshore Mall 1B, LLC, and Bayshore Mall 2, LLC to Compel Immediate Payment of Post-Petition Rent and Lease Obligations Pursuant to 11 U.S.C. §§ 365(d)(3) and 503(b)(1)(A)* (the “Motion”) with United States Bankruptcy Court for the District of Delaware (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that responses, if any, to the Motion must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the District of Delaware, filed with the Bankruptcy Court on or before **January 28, 2025 at 4:00 p.m. (ET) (the “Objection Deadline”)**. At the same time, you must also serve a copy of the response upon undersigned counsel.

**PLEASE TAKE FURTHER NOTICE THAT** a hearing on the Motion is scheduled for **February 26, 2025 at 10:30 a.m. (ET) (the “Hearing”)** before the Honorable J. Kate Stickles, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5<sup>th</sup> Floor, Courtroom #6, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH PLEADINGS WITHOUT FURTHER NOTICE OR HEARING.**

<sup>1</sup> The debtors and debtors in possession in these Chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Respectfully submitted,

Dated: January 14, 2025

By: /s/ Leslie B. Spoltore  
Leslie B. Spoltore, Esquire  
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*Counsel to Bayshore Mall 1A, LLC, Bayshore Mall 1B,  
LLC, and Bayshore Mall 2, LLC*